



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DIVISION OF VIRGINIA
RICHMOND DIVISION

K.B. , by her Mother,
SAKIA HALL, as next friend, and
SAKIA HALL,

Plaintiffs,

vs.

3:11-cv-00065-JRS

HAROLD FORD,

Defendant.

DEPOSITION OF KAREENA EDWARDS-CARTER

May 26, 2011

5:25 p.m.

Taken at:

The City Attorney's Office
900 East Broad Street, Suite 300
Richmond, Virginia

REPORTED BY: LISA M. KULL, RPR

COOK & WILEY, INC.
Registered Professional Reporters
Post Office Box 14582
Richmond, Virginia 23221

1 I will start with Ms. Edwards-Carter.

2

3 EXAMINATION BY MR. CORRIGAN:

4 Q Ms. Carter-Edwards, would you state your
5 full name, please?

6 A Kareenna Edwards-Carter.

7 Q And Ms. Edwards, what do you do for a
8 living?

9 A I'm an elementary school teacher.

10 Q Where do you teach?

11 A Fairfield Court Elementary.

12 Q What grade?

13 A Third grade.

14 Q How long have you been teaching third
15 grade at Fairfield Court Elementary?

16 A Three years.

17 Q Last year during the 2009-2010 school
18 year, did a young lady named K.B. , was she
19 one of the students in your class?

20 A Yes.

21 Q Do you recall a time last year on March
22 23, 2010 when there was an incident in your class
23 where Ms. Ebanks was present and Officer Ford was
24 present?

25 A Yes.

1 Q Let me show you a report that I believe
2 you prepared. Is that your signature?

3 A Yes.

4 Q And is that the report that you
5 prepared?

6 A Yes.

7 Q Okay. And does that report accurately
8 set forth what occurred that day?

9 A Yes.

10 Q If you would just describe for me your
11 best recollection of what was going on on March
12 23, 2010 in your classroom?

13 A There was one student who was upset about
14 something. And he kept pulling his chair back and
15 forth and making noises. And some of the kids
16 were, you know, he was doing things to make some
17 of the other kids laugh. And I was reminding them
18 that we were coming down to almost to SOL time and
19 they should be getting serious. I thought I would
20 call Ms. Ebanks in just to talk to them, remind
21 them of the expectations.

22 Q Who is Ms. Ebanks?

23 A Ms. Ebanks is the assistant principal.

24 Q What happened next?

25 A She came down to the room. Officer Ford

1 was with her. She started talking to the kids.
2 And most of -- well, they got quiet. They were
3 responding to her positively except for K.B. She
4 was scratching on her desk with her nails. She
5 had fake nails on. And she was pushing her desk
6 back and forth, back and forth. She was moving
7 her chair, you know, she was just being really
8 disrespectful.

9 And Officer Ford asked her what the
10 problem was. She kept doing the same thing. He
11 asked her if she wanted to step outside and talk.

12 Q Before that happened, did there come a
13 time when you discussed with Ms. Ebanks the
14 behavior of the class and decided that there was
15 going to be lunch in the room?

16 A Oh, yes. I think that was -- that's what
17 made K.B. to, prompted K.B. to start acting up.
18 Ms. Ebanks asked me if I wanted her to take a
19 student out. And I told her I would prefer if
20 they have lunch inside instead of going to --
21 I don't remember what activity they had afterward.
22 But, we would have lunch inside and then we would
23 do language arts during that period because they
24 had to start their language arts book. And I was
25 not able to complete that.

1 Q What was K.B.'s reaction to the
2 announcement that lunch was going to be in the
3 room?

4 A That's when she started pulling her desk
5 and making noises.

6 Q And that's when Officer Ford asked her if
7 she had something she wanted to say?

8 A Yes. And she continued doing what she
9 was doing.

10 Q Was he respectful toward her? Officer
11 Ford?

12 A Yes, he was.

13 Q Okay. And what happened then?

14 A He asked her to step outside. And, I
15 mean, she got up and she went outside with him.

16 Q Okay. And was that the last you saw of
17 them at that time?

18 A At that time, yes.

19 Q Okay. Did she come back in the classroom
20 later that day?

21 A Yes, she did. She came back. She came
22 back. I think she actually had lunch in the room
23 with us. You know, I don't remember if she came
24 back after lunch. But, I remember when she came
25 back she was calm for the entire day.

1 Q She was calm?

2 A For the rest of the day, didn't have any
3 problem.

4 Q She behaved herself?

5 A She did. She behaved herself. In the
6 afternoon, when it was time for her to go home,
7 she didn't want to go home. She wanted to stay
8 after school. And I'm thinking, since she behaved
9 well for the rest of the day, I would ask her
10 mother, because her mother was in the office to
11 pick her up. I would ask her if she could stay.

12 So, when they called for her, I told her
13 to go, leave her stuff, go up to the office to ask
14 her if she could stay after school. She said no.
15 So she came back to get her stuff.

16 MR. CORRIGAN: Okay. Thank you. That's
17 all the questions I have for you today.

18 (Examination concluded at 5:33 p.m.)

19 AND FURTHER THIS DEPONENT SAITH NOT.
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